

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**JOHN C. CREUZOT,**

**Plaintiff,**

**v.**

**ALVIN GREEN,**

**Defendant.**

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**Civil Action No. 3:17-cv-00404**

**PLAINTIFF’S MEMORANDUM IN SUPPORT OF PLAINTIFF’S MOTION FOR  
EXPEDITED CONSIDERATION OF PLAINTIFF’S APPLICATION FOR  
PRELIMINARY INJUNCTION**

Plaintiff John C. Creuzot (“Mr. Creuzot”) respectfully requests the Court grant expedited consideration of Plaintiff’s Application for Preliminary Injunction, and, if appropriate, refer consideration of the Application for Preliminary Injunction to the assigned United States Magistrate Judge.

**Background**

On February 22, 2017, Mr. Creuzot filed Plaintiff’s Verified First Amended Complaint and Application for Preliminary Injunction [Dkt. No. 6]. Defendant was served on February 24, 2017 [Dkt. No. 7]. Defendant Alvin Green’s answer is due on March 17, 2017, pursuant to Federal Rule of Civil Procedure 12. Defendant Green’s response to the Application for Preliminary Injunction is due on March 17, 2017, pursuant to Northern District of Texas Local Rule 7.1(e). Based on the nature of Mr. Creuzot’s Application for Preliminary Injunction, he now seeks to have the Court consider it on an expedited basis.

### **Argument and Authority**

Mr. Creuzot is a candidate for Dallas County District Attorney, and his lawsuit involves cybersquatting by Defendant Green related to domain names using Mr. Creuzot's name in violation of federal law. Because Mr. Creuzot is actively campaigning without use of the domain names procured by Defendant Green, Mr. Creuzot requests expedited consideration and, if appropriate, referral to the assigned United States Magistrate Judge of his Application for Preliminary Injunction.<sup>1</sup>

### **Prayer**

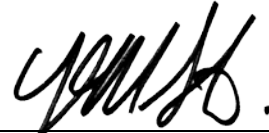
Plaintiff John C. Creuzot respectfully requests the Court grant expedited consideration of Plaintiff's Application for Preliminary Injunction, and, if appropriate, refer consideration of the Application for Preliminary Injunction to the assigned United States Magistrate Judge and for such other relief in law or in equity which Plaintiff may be entitled.

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<sup>1</sup> A district court may designate a magistrate judge to hear and submit recommendations on motions for injunctive relief. 28 U.S.C. § 636(b)(1)(A), (b)(1)(B).

Dated: March 1, 2017

Respectfully submitted,



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**ATTORNEY FOR JOHN C.  
CREUZOT**

**CERTIFICATE OF CONFERENCE**

Counsel for Plaintiff sent the proposed Motion for Expedited Consideration of Plaintiff's Application for Preliminary Injunction and Memorandum in Support of Same to Defendant for review on February 28, 2017. Defendant opposed the Court hearing Plaintiff's Application for Preliminary Injunction on an expedited basis but did not state the basis for his objection.

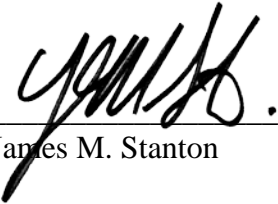


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James M. Stanton

**CERTIFICATE OF SERVICE**

I certify that on March 1, 2017, the foregoing instrument was served on Defendant by electronic mail at the address confirmed by Defendant.

  
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James M. Stanton